

RELATED CORRESPONDENCE

BEFORE THE

DOCKETED
USNRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

'86 OCT 20 P1:30

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY :

OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket No. 50-352/353-0L

AMENDMENT TO
APRIL 1, 1986 APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSE
NPF-39

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In the April 1, 1986 Application for Amendment of Facility Operating License NPF-39, Philadelphia Electric Company (Licensee) requested that Appendix A to the license be amended to reflect changes to the plant staff position titles and to the plant staff and off-site organizations.

By letter dated May 20, 1986 the Commission Staff advised Licensee that changes to the format and content of the analyses in the Application were required for the Staff to further consider Licensee's Application. Specifically, the Staff requested that a discretely identified safety analysis discussion be provided for each change or type of change. The Staff further

requested that a technical discussion/analysis be provided to support Licensee's No Significant Hazards Consideration conclusion for each of the proposed changes or type of change. Accordingly, Licensee hereby amends its April 1, 1986 Application by adding thereto the following supplementary information:

The proposed administrative changes discussed in this Application involve three distinct types, or categories of changes:

- a. Changes to the plant staff (on-site) and off-site support organizations including changes to the management structure at plant level along with the associated position title changes. ("Category A")
- b. Changes to clarify the overtime policy to include Licensee specific terminology and to include further working groups in the overtime restriction clause. ("Category B")
- c. Revisions to the Plant Operating Review Committee in order to recognize the new plant staff organization along with the associated position title changes and to provide additional assurance of the requisite cross-discipline review process. ("Category C")

A Safety Analysis of each of the categories of proposed changes to the Technical Specification follows. Following the Safety Evaluation a separate discussion of each of the three standards as set forth in 10 CFR Section 50.92 to support Licensee's conclusion that the changes do not involve a Significant Hazards Consideration is presented.

Category A

- o Category A consists of proposed changes to the plant staff position titles along with proposed changes to the organization charts, reflecting restructuring of the plant staff and off-site support organizations.

Safety Analysis

The Category A changes including staff position title changes, the reorganization of plant staff and off-site support organizations and the proposed changes to the organizational charts are all inter-related. These administrative changes reflect a response to a need for the reorganization of management at plant level and restructuring of the off-site support organizations in order to provide more responsive control and because of growth and specialization. The basic changes to the plant staff also reflect changes which were made to both the organizations at the Limerick Generating Station and at the Peach Bottom Atomic Power Station in order to bring both stations under a common organizational plan.

The specific changes include:

- a. Promotion of the Plant Superintendent to Plant Manager in response to the increased responsibility and managerial demands associated with that position.
- b. Division of plant staff into three functionally distinct chains of command, with the administrative functions

reporting directly to the Plant Manager, and the operations related functions reporting to a new position of Superintendent-Operations. Technical support services reports to a new position of Superintendent-Plant Services.

- c. The position of Outage Planning Engineer meeting the ANSI/ANS 3.1-1978 requirements was created in order to provide further co-ordination and control of outage related work functions and to provide the necessary specialization in this area.
- d. The position of ALARA Health Physicist was created to provide greater supervision and attention to this area.
- e. Positions which were previously titled Administrative Group, and Results Engineer, are now titled Administration Engineer, and Performance Engineer, respectively. These changes are being made to plant staff position titles on the organization charts in order to reflect titles which are currently in use. The two changes in position titles will provide consistency with the Peach Bottom organization charts.
- f. Because of an increased level of activity and scope of work, the Quality Assurance Section of the Engineering and Research Department has been elevated to Division level. Being on the Division level increases the ability of the Quality Assurance Section to interface with the other Division level organizations.

g. The Research and Testing Division of the Engineering and Research Department has been separated into the Testing and Laboratories Division and into the Research and Planning Division. The splitting of the Research and Testing Division was necessitated by the increased specialization of the planning tasks and by the increased management attention to those areas concerning nuclear plant safety.

The ability of management to effectively respond to safety issues is not diminished by making the title changes or by restructuring the plant staff and off-site support organizations. The qualifications and educational and training requirements for the positions which had a title change continue to meet or exceed the requirements of ANSI/ANS 3.1-1978 and other requirements as described in Section 6.3, page 6-6 of the Technical Specifications. The restructuring of the off-site support organizations will increase the ability of management to respond to safety issues.

No Significant Hazards Consideration:

Category A Changes

- (1) The proposed changes to the plant staff position titles, the off-site support and plant staff organization charts do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes do not decrease the qualifications, the experience nor the training requirements of those positions which had a title change, but merely reflect an enhancement of supervisory overview because of the additional management levels. The administrative reorganization which adds a supervisory level below the plant manager, also changes the titles for some of the members of plant staff, yet does not decrease the effectiveness of the organization's ability to respond to safety issues by virtue of the new supervisory levels and positions. The restructuring of the off-site organization allows management to further increase attention and focus on safety issues.

Therefore, based on the reorganization and position title changes, the proposed changes to be made to the organizational charts being merely administrative in nature, do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) The proposed changes to the plant staff position titles, the off-site support and plant staff organization charts do not create the possibility of a new or different kind of accident from any previously evaluated.

The effectiveness of the Limerick Station and off-site support organizations is enhanced by the proposed changes. No change to the operation or configuration of the plant systems will result from this proposed Technical Specification change. The changes are merely administrative and they enhance the ability of management to effectively respond to safety issues. Therefore,

the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) The proposed changes to the plant position titles, the off-site support and plant staff organization charts do not involve a significant reduction in a margin of safety.

Philadelphia Electric Company, in response to the need for additional supervisory positions and in an effort to align both Limerick Generating Station and Peach Bottom Atomic Power Station along similar organizational plans, created new supervisory positions and changed certain position titles at both stations. The organization charts were revised in order to present the organization changes in a graphic format for easier interpretation of the various organizational inter-relationships. The revised charts do not in themselves change, nor are they meant to change, the position requirements in regard to experience and qualifications of each supervisory position. Therefore, the administrative changes as discussed, do not reduce the margin of safety.

Category B Changes

- o Category B consists of proposals which were made to add organizational groups under the limiting provisions of the overtime restrictions and proposals for editorial changes to the overtime restriction section of the Technical Specifications.

All of the changes to the overtime restriction areas are grouped under the Category B type change because the proposed changes are all related to the ability of personnel to effectively perform safety related functions without undue physical or psychological stress caused by excessive overtime working hours.

Safety Analysis

The proposed changes grouped under Category B preserve the intent of the Technical Specification while adding personnel to the overtime restriction list. Also, the proposed change to generic supervisory titles does not change the intent of the Technical Specifications because the authorization for deviation from the overtime restrictions will continue to be authorized at the same supervisory levels, while eliminating the necessity for revising the Technical Specifications each time a supervisory title change occurs.

The need for additional personnel to be included under the overtime restrictions in the administration area is partially due to the unique terminology used by the Licensee to internally designate the different levels of supervision and organizational groups within the Philadelphia Electric Company. The term "maintenance" is used by Philadelphia Electric Company to designate only those PECO employees in the Maintenance Division of the Electric Production Department who perform maintenance functions and does not include the Engineering and Research Department Testing and Laboratory (Instrument Technicians) and Construction forces who also perform maintenance type functions,

including safety related work. Therefore, it is proposed that the Testing and Laboratory and the Construction forces be included in the overtime restriction clause.

The term "Employing Officer" is used in lieu of position title in order to avoid fragmented responsibility for overtime control on a large project involving multiple groups. Each group in such a project has an assigned "Employing Officer" to maintain employee administrative functions and each group also has a designated manager, such as "Project (or Plant) Manager" to manage the overall work plan. The employing officer is responsible for the administration of overtime and the authorization of any deviations from the overtime restrictions. The Project (or Plant) manager among other duties, coordinates the overall project (or Plant) in the work plan and scheduling areas.

The change in terminology to "Employing Officer" does not change and is not meant to change, the present or future management level at which approval is given for deviation from the overtime policy.

Therefore, the proposed administrative changes to add personnel to the overtime restriction clause and to use the generic title (Employing Officer) in lieu of several specific titles as discussed, maintains the margin of safety.

No Significant Hazards Considerations:

Category B Changes

- (1) The proposed changes in terminology and the proposed additional groups to be included in the overtime restrictions do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The addition of the Testing and Laboratory and the Construction groups to the overtime restriction clause on page 6-2, paragraph f, is more conservative by virtue of including additional personnel who are restricted from working excessive overtime. Licensee is responding to the need to include these additional groups because these personnel perform safety related functions.

The changes in terminology regarding authorization of deviations to the overtime restrictions on page 6-2 paragraph f, were proposed in order to set similar standards for the Peach Bottom Atomic Power Station and the Limerick Generating Station and to recognize licensee unique terminology.

Increasing the personnel restricted from working excessive overtime is more conservative than the existing Technical Specification. Further, revising the terminology used to describe the supervisory level at which deviations from the overtime restrictions may be approved, without changing these supervisory approval levels, does not involve a significant

increase in the probability or consequences of an accident as previously evaluated.

- (2) The proposed changes in terminology and the proposed additional groups to be included in the overtime restrictions do not create the possibility of a new or different kind of accident from any previously evaluated.

The inclusion of the Construction, and Testing and Laboratory personnel to those listed in the overtime restrictions on page 6-2 paragraph f, make the specifications more conservative and restricts more personnel who perform safety related functions from working excessive overtime than was previously specified.

Further, the proposed changes in terminology on page 6-2, paragraph f, regarding deviation from the overtime restrictions, merely utilizes generic type supervisory position descriptions (Employing Officer) to allow the specification to be similar to the Peach Bottom Technical Specifications and also to preclude making Technical Specification amendments each time minor changes are made to position titles. The editorial changes preserve the intent of the original specifications without being specific as to the supervisory position titles. The proposed changes in terminology, along with the groups being added to the overtime restriction clause, therefore do not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) The proposed changes in terminology and the proposed additional groups to be included in the overtime

restrictions do not involve a significant reduction in a margin of safety.

The administrative changes made to the overtime restriction clauses on page 6-2 paragraph f, are more conservative than the previous Technical Specifications, and the terminology changes preserve the bases of the Technical Specifications for limiting the overtime hours worked by groups involved with safety related functions. The changes described, therefore, preserve the margin of safety.

Category C Changes

- o The Category C changes consist of proposals for correcting the titles indicated in the Technical Specifications for the Plant Operating Review Committee (PORC) members, and proposals for changing the PORC membership.

Safety Analysis

The proposed changes to the Plant Operating Review Committee membership and titles indicated in the Technical Specifications have been grouped into a third category because all of the proposed changes to the PORC are inter-related.

- o Position title changes and staff restructuring created the need to revise the PORC membership and titles as follows:

<u>EXISTING</u>		<u>PROPOSED</u>
Station Superintendent*	:	Manager--Limerick Generating Station
(None)	:	Superintendent--Operations
(None)	:	Superintendent--Plant Services
(None)	:	Outage Planning Engineer
Engineer--Technical*	:	Technical Engineer
Engineer--Operations*	:	Operations Engineer
Engineer--Maintenance*	:	Maintenance Engineer
Regulatory Engineer	:	(remove)
Reactor Engineer	:	(remove)
I&C Engineer	:	(remove)
Senior Health Physicist	:	Senior Health Physicist
Shift Superintendent	:	Shift Superintendent
(None)	:	Senior Chemist

* Title change only.

- o The PORC membership by the proposed change would be increased by one member; from Chairman and eight members to Chairman and nine members.

The proposed membership changes in the PORC are based on title changes and the staff reorganization. The changes increase the experience/expertise base of the PORC. The addition of the Superintendent--Operations, the Superintendent--Plant Services, the Outage Planning Engineer and the Senior Chemist to the PORC

membership list will broaden and enhance the ability of the PORC to provide a cross-discipline review of those matters related to nuclear safety.

The qualifications including the educational and training requirements for the PORC membership, as proposed, would continue to meet or exceed the requirements of ANSI/ANS 3.1-1978 and other requirements as described in Section 6.3, page 6-6 of the Technical Specifications.

In order to add more experience/expertise, yet maintain ten or less members on the PORC, additional senior staff members were added and other members were removed. The removal from the PORC listing of the positions of Regulatory Engineer, Reactor Engineer and I&C Engineer help offset the additions of Superintendent - Operations, Superintendent - Plant Services, Outage Planning Engineer and the Senior Chemist. The quorum established for the PORC (Chairman and four members) assures that adequate cross-discipline review is not diluted and that input for those areas where safe operation of the plant would require special knowledge and engineering/scientific expertise continues to be available to the PORC. The PORC consistency would be maintained by a quorum of Chairman and four members (5 people) for a PORC of Chairman and nine members (10 people) i.e., one half of the PORC.

Licensee, as discussed above, does not propose to make any changes to the PORC quorum as it exists in the present Technical Specification. The existing Specification has been determined to be adequate for the PORC to perform its safety related functions and would allow both Peach Bottom Atomic Power Station and

Wimerick Generating Station to have a similar PORC quorum of Chairman and four members along with a similar PORC membership of Chairman and nine members.

No Significant Hazards Consideration

Category C Changes

- (1) The position title changes, and the membership changes proposed for the PORC do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The members of the proposed PORC meet or exceed the qualifications requirements for those positions as described in page 6-6 paragraph 6.3 of the Technical Specifications and further, the proposed changes in membership increases the experience/expertise base of the PORC. This change does not reduce the effectiveness of the PORC because the technical disciplines necessary to perform the cross-discipline review continue to be represented after changing the membership, as proposed. The PORC consistency is maintained by a quorum of Chairman and four members which is one half of the total PORC membership.

- (2) The position title changes and the membership changes proposed for the PORC do not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes to the PORC are strictly administrative in nature and do not affect the ability of the PORC to perform safety related functions. The qualifications of the member positions as described in page 6-6 paragraph 6.3 of the Technical Specifications are not changed and therefore the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) The position title changes, and the membership changes proposed for the PORC do not involve a significant reduction in a margin of safety.

The proposed changes are due to plant staff organization restructuring which resulted in new position titles. The proposed changes to the PORC improves the effectiveness of the PORC by including a broader base of experience. The proposed changes for the PORC do not change the PORC quorum of Chairman and four members (one half) as has been expressed as the quorum which the commission staff has determined to be optimum. The proposed membership and other PORC changes maintain the margin of safety.

Conclusions

Based on the above discussions, the Licensee finds that as concluded previously in the April 1, 1986 Application, the three types of proposed changes as described in the Application, as amended, do not involve a Significant Hazards Consideration:

- o The proposed changes to the plant staff position titles and resultant changes to the organization charts

reflecting restructuring of the off-site support and plant staff organizations do not involve a Significant Hazards Consideration.


- o The proposed addition of personnel to be included under the limiting provisions of the overtime restrictions and the proposed editorial changes to the overtime restriction section of the Technical Specifications do not involve a Significant Hazards Consideration.
- o The proposed changes and the correction of titles of the Plant Operating Review Committee (PORC) members, and changes made to the PORC membership do not involve a Significant Hazards Consideration.

Environmental Consideration

This amendment revises certain administrative areas of the Limerick Generating Station Unit 1 Technical Specifications. The Licensee has determined that the amendment, based on only administrative changes, involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and has determined that there is no significant increase in individual or cumulative occupational radiation exposure.

Respectfully Submitted
Philadelphia Electric Company

By


Vice President

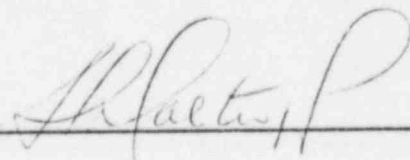
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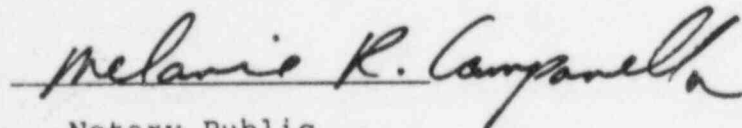
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



Subscribed and sworn to
before me this 16th day
of October, 1986



Notary Public

MELANIE R. CAMPANELLA

Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires February 12, 1990

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

'86 OCT 20 P1:30

In the Matter of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station,
Unit No. 1)

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Docket No. 50-352
SECRETARY
DOCKETING & SERVICE
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CERTIFICATE OF SERVICE

I hereby certify that copies of an Amendment to Philadelphia Electric Company's April 1, 1986 Application for Amendment of Facility Operating License NPF-39 in the above-captioned matter were served on the following by deposit in the United States mail, first-class postage prepaid on this 17th day of October, 1986.

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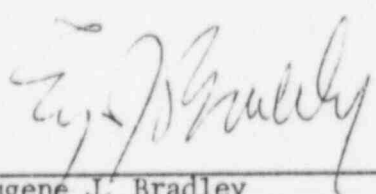
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